

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES, et al.,	)	
	)	
Plaintiffs,	)	
v.	)	No. 1:23-cv-00108-LMB-JFA
	)	
GOOGLE LLC,	)	
	)	
Defendant.	)	

**PLAINTIFFS’ MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Local Civil Rule 5(C) and the Modified Protective Order (Dkt. 203), Plaintiffs respectfully move this Court to seal Exhibit 1 to Plaintiffs’ Response to Google’s Status Report and the portions of the Response that disclose the contents of Exhibit 1. Exhibit 1 and the portions of the Response that Plaintiffs seek to seal contain material Defendant Google has designated as confidential or highly confidential. Consistent with the local rule and this Court’s Electronic Case Filing Policies and Procedures, undersigned counsel have filed the materials at issue using the sealed filing event on CM/ECF and hereby certify that they will serve a copy on opposing counsel and deliver a copy to this Court in a separate container labeled “UNDER SEAL.” The grounds for this motion are contained in the accompanying memorandum of law. A proposed order is attached for the Court’s convenience.

Dated: June 29, 2025

Respectfully submitted,

ERIK S. SIEBERT  
United States Attorney

/s/ Gerard Mene  
GERARD MENE  
Assistant U.S. Attorney  
2100 Jamieson Avenue  
Alexandria, VA 22314  
Telephone: (703) 299-3777  
Facsimile: (703) 299-3983  
Email: Gerard.Mene@usdoj.gov

/s/ Julia Tarver Wood  
JULIA TARVER WOOD  
MATTHEW R. HUPPERT  
DAVID TESLICKO  
MICHAEL E. WOLIN

United States Department of Justice  
Antitrust Division  
450 Fifth Street NW, Suite 7100  
Washington, DC 20530  
Telephone: (202) 307-0077  
Fax: (202) 616-8544  
Email: Julia.Tarver.Wood@usdoj.gov

*Attorneys for the United States*

JASON S. MIYARES  
Attorney General of Virginia

/s/ Tyler T. Henry  
TYLER T. HENRY  
Assistant Attorney General

Office of the Attorney General of Virginia  
202 North Ninth Street  
Richmond, VA 23219  
Telephone: (804) 692-0485  
Facsimile: (804) 786-0122  
Email: thenry@oag.state.va.us

*Attorneys for the Commonwealth of  
Virginia and local counsel for the  
States of Arizona, California,  
Colorado, Connecticut, Illinois,  
Michigan, Minnesota, Nebraska, New  
Hampshire, New Jersey, New York,  
North Carolina, Rhode Island,  
Tennessee, Washington, and West  
Virginia*